

1 A We have all the backup. First we have the
2 PO --

3 Q That's the purchase order?

4 A Excuse me, the purchase order. Then we have
5 all the backup information, meaning the invoice that shows
6 all the facts of what we're paying.

7 Q And you review that before you sign it?

8 A Yes.

9 Q And you review that as part of your
10 responsibilities before you sign the check, obviously, to
11 review the --

12 A Yes.

13 Q Do you follow the same procedure for NMTV
14 checks as you do for TBN checks?

15 A Absolutely.

16 Q Now, you answered some questions from Mr. Shook
17 about donor contributions, and I want to make sure my notes
18 are right. Donor contributions could be addressed to TBN?

19 A Correct.

20 Q They could be addressed to affiliates; is that
21 correct?

22 A Yes.

23 Q And give me an example at random of such an
24 affiliate, anyone that comes to your mind.

25 A Well, it could be CET. However, the CET

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DEPOSITION
SERVICE, INC.

1 provide business services.

2 A Yes.

3 Q I think, in fairness to you, you ought to have
4 the document in front of you. I think when Mr. Shook
5 examined you, I think you had an opportunity to look at it,
6 but I think you should have a further opportunity to look at
7 it.

8 A Okay.

9 Q My note reflects that you said you didn't
10 negotiate that agreement.

11 A That is correct.

12 Q Why was the document signed by you on behalf
13 of -- I don't have it in front of me, but you signed on
14 behalf of Trinity; is that correct?

15 A Correct.

16 Q Why was the document signed by you?

17 A I can't answer that, Counselor.

18 Q Who asked you to sign it?

19 A It came from Mrs. Duff.

20 Q Do you recall her asking you to sign it?

21 A Not asking, but sent it to me.

22 Q Do you remember discussing the document with
23 Mrs. Duff?

24 A I did not discuss it with her.

25 Q So you received the document from Mrs. Duff and

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

COHEN & BERFIELD

In re Applications of)
)
TRINITY BROADCASTING OF)
FLORIDA, INC.)
)
For Renewal of License of)
Station WHFT(TV), Channel)
45, Miami, Florida)
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GLENDALE BROADCASTING)
COMPANY)
)
For a Construction Permit)
for a New TV Station on)
Channel 45 at Miami, Florida)
)

MM DOCKET NO. 93-75

File No. BRCT-911001LY

File No. BPCT-911227KE

COPY

DEPOSITION OF TERRENCE M. HICKEY

Santa Ana, California

Thursday, September 30, 1993

Sarnoff
**DEPOSITION
SERVICE, INC.**

REPORTED BY:

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800.888.6949

1 A That's correct, sir.

2 Q Just to clarify something, this is your
3 signature as assistant secretary, Terrence Hickey?

4 A Yes.

5 MR. TOPEL: Off the record.

6 (Recess taken.)

7 MR. SHOOK: Back on the record.

8 Q Mr. Hickey, with respect to the document that I
9 had shown you before that I am now handing back to you, I
10 want you to focus on a couple of things there. You will
11 note that the first paragraph reads, "The undersigned, being
12 all of the directors of Translator TV, Inc."

13 Now, would I be correct in understanding that,
14 although your signature is down below, you were not a
15 director of Translator TV, Inc.?

16 A That's correct.

17 Q Did you have any role in the preparation of
18 this document other than the fact that your signature
19 appears on it?

20 A No.

21 Q Can you tell us how this document came to your
22 attention?

23 A I don't remember the details of it.

24 Q Do you recall signing the document in the
25 presence of both Paul Crouch and Jane Duff, whose signatures

1 A No.

2 Q Did you have any role relative to the matters
3 that are noted in the paragraph beginning with "Resolved"
4 that appear in the action by written consent of the board of
5 directors of Translator TV, Inc.?

6 A Which paragraph are you referring to now, I'm
7 sorry? The same one?

8 Q Right the paragraph that begins with
9 "Resolved."

10 A Number 2, all right. Now, what's the question?

11 Q When you took any part or had any role in the
12 functions that are noted in that paragraph.

13 A No, I did not.

14 Q I'm going to show you a document entitled
15 "Action by Written Consent of Board of Directors of
16 Translator TV, Inc.," referencing an action that bears a
17 date or relative to a date of February 8, 1987, Bates
18 stamped page number 7286.

19 MR. COHEN: Can I see that, please. Thank you.

20 BY MR. SHOOK:

21 Q Is one of the signatures on that document
22 yours?

23 A Yes.

24 Q Do you know how it is you came to sign that
25 document?

1 A No.

2 Q Do you see what the document says?

3 A I've read the document, yes.

4 Q And the document says that you are a member of
5 the board of directors?

6 A It's an error. I was not a member of the board
7 of directors. I sign hundreds of papers in the course of
8 the job, and one of my faults is I don't read everything I
9 sign. They stick it under my nose, I sign it and go on. I
10 obviously did not read this or focus on it, because that's
11 an error. I was not a director, nor did I think I was a
12 director.

13 Q Now, also for the purposes of the spelling of
14 your name, your first name is two r's or one r?

15 A Two r's.

16 Q So whoever typed this managed not to type your
17 name correctly.

18 A It's a very common error with the name
19 Terrence.

20 Q Would it be a matter of practice if your
21 signature appeared as the second of three signatures that
22 the first signatory would have signed the document first and
23 then that person's office would have passed it on to you,
24 you would have signed it and then in turn passed it on to
25 the third person?

1 A Yes.

2 Q And in what capacity do those signatures
3 reflect that you are signing on behalf of the corporation?

4 A I guess secretary.

5 Q Do you recall being elected to the position of
6 secretary?

7 A No.

8 Q Is your practice in signing documents to sign
9 them as Terrence Hickey or Terry Hickey?

10 A Terrence Hickey.

11 Q Signing this document as Terry Hickey, it's
12 your signature and there is no problem with you
13 recognizing --

14 A That is my signature, yes. I just signed it
15 because it said Terry Hickey.

16 Q Now I want you to focus on how the first line
17 of type reads under the heading --

18 MR. TOPEL: Excuse me, Mr. Shook. Are we on the same
19 document?

20 MR. SHOOK: Yes. I see we have different page
21 numbers, but it appears to be the same document.

22 MR. TOPEL: Except for the Secretary of State's
23 endorsement.

24 MR. COHEN: Can I see if my copy is the same as
25 everybody else's, if we're all talking about the same one?

Samuel
REPRESENTATION
SERVICE, INC.

1 Inc. or, as it later became known, National Minority TV,
2 Inc.?

3 A At what period of time?

4 Q Ever.

5 MR. TOPEL: Any meeting?

6 MR. SHOOK: Any meeting.

7 THE WITNESS: Oh, yes. Yes.

8 BY MR. SHOOK:

9 Q Now, with that in mind, can you tell us which
10 meeting or meetings you may have attended?

11 A Well, you showed me minutes from a 1982 meeting
12 that I was obviously at.

13 Q Correct.

14 A Do you want dates of meetings?

15 Q If you can give me an approximation. Basically
16 what I'm trying to find out is if you can recall how many
17 meetings of the board of directors of that corporation you
18 may have attended. We've already established that there was
19 at least one, and we've established when that was.

20 Now, other than that one, do you have any
21 present recollection of having attended any other meeting of
22 the board of directors of National Minority TV, Inc. or its
23 predecessor Translator TV, Inc.?

24 A Since I've come back in September of 1991, I
25 think I've been to, to the best of my recollection, three or

1 four.

2 Q All right. The minutes may or may not reflect
3 such presence, which is why I was asking you the question.
4 And to the extent that the minutes do reflect your presence,
5 I'll ask you questions when I get to those minutes, but I
6 just wanted to cover this in a general way right now.

7 I'm going to show you a copy of the minutes of
8 a special meeting of National Minority TV, Inc. that was
9 held on June 22, 1987 at Newport Beach, California.

10 Did you notice on the second page that your
11 name was referenced?

12 A Yes.

13 Q And did you notice what the reference was
14 about?

15 A Yes.

16 Q Do you recall attending this meeting, first of
17 all?

18 A No, I did not attend.

19 Q Do you recall taking the actions that are
20 referenced in these minutes, that is, apparently being
21 involved in the opening of a bank account for National
22 Minority TV?

23 A Yeah, because I was providing an accounting
24 service to NMTV.

25 Q Thank you. In conjunction with providing that

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In re Applications of)
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TRINITY BROADCASTING OF)
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GLENDALE BROADCASTING)
COMPANY)
)
For a Construction Permit)
for a New TV Station on)
Channel 45 at Miami, Florida)
)

MM DOCKET NO. 93-75

File No. BRCT-911001LY

File No. BPCT-911227KE

COPY

DEPOSITION OF MATTHEW CROUCH

Santa Ana, California

Monday, September 20, 1993

Sarnoff
**DEPOSITION
SERVICE, INC.**

REPORTED BY:

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1 A No.

2 Q Have you ever heard of an entity called
3 National Minority Television?

4 A Yes.

5 Q And what is your knowledge of that company?

6 A It owns a TV station in Portland or controls
7 the license.

8 Q And do you know when NMTV was organized?

9 A Several years ago.

10 Q And do you know for what purpose it was
11 organized?

12 A To do television production.

13 Q And what's your source of knowledge on that
14 point?

15 A My father.

16 Q He told you that?

17 A Yes.

18 Q Are you an officer of NMTV? Do you know if you
19 are?

20 A Currently I am not, as far as I know.

21 Q You are not, you say?

22 A I am not, as far as I know.

23 Q And when did you cease being an officer?

24 A I'm not sure that I am, so I'm not sure when it
25 would cease.

1 Q You mean you may be an officer, you may not be
2 an officer, you have no knowledge?

3 A I do not know.

4 Q Do you know if you were ever an officer?

5 A Yes, I was, at one point.

6 Q And what office did you hold?

7 A Assistant secretary.

8 Q And do you know what period of time you were
9 assistant secretary?

10 A I do not know the specific dates.

11 Q Do you know the general dates?

12 A From '87 or '88, approximately.

13 Q Until when?

14 A I'm not sure if I still am.

15 Q And were you present at the meeting of NMTV
16 when you were elected assistant secretary?

17 A No.

18 Q How did you learn you were elected?

19 A I would have probably been told by my father.

20 Q But you have no specific recollection?

21 A No.

22 Q Were you told before you were elected that you
23 were going to be elected?

24 A I don't recall that, no.

25 Q Your recollection is you were told you had been

1 Q Do you know who the directors of NMTV have been
2 since the corporation was organized in 1980?

3 A I may have a complete list in my mind, but I
4 wouldn't be sure.

5 Q Well, tell me what your recollection is.

6 A Pastor Phil Aguilar, Pastor E.V. Hill, Jane
7 Duff and my father.

8 Q Do you know when these persons, during what
9 periods of time they served as directors of the corporation?

10 A No.

11 Q Do you know anything about how the affairs of
12 NMTV have been conducted?

13 A No.

14 Q No knowledge of that?

15 A (No audible response.)

16 Q Do you know the responsibilities of the
17 officers and directors of NMTV?

18 A To serve their community with programming.

19 Q Do you know the individual responsibilities of
20 what each person does --

21 A No.

22 Q -- in carrying out his or her duties at NMTV?

23 A No.

24 Q Do you know what Jane Duff does?

25 A Administrator?

1 A No.

2 Q You never have?

3 A No.

4 Q Do you know who is responsible for production
5 for NMTV?

6 A No.

7 Q I may have asked you this before, and if so, I
8 apologize, but is it correct that you have never attended
9 any board meeting of NMTV?

10 A (No audible response.)

11 Q That is correct?

12 A I have not attended.

13 Q Did your father tell you why he wanted you to
14 be a signatory on the various checking accounts as compared
15 to someone else?

16 A A trusted convenience.

17 Q What do you mean by that?

18 A Somebody that he trusts and is there for
19 convenience.

20 Q So you fit the bill in both ways, he trusted
21 you and you were around?

22 A Apparently.

23 Q I may have asked you this before, and if I did,
24 I apologize, you stated that you were assistant secretary of
25 TBN until you resigned in May of 1992. Did you state

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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In re Applications of)
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TRINITY BROADCASTING OF)
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GLENDALE BROADCASTING)
COMPANY)
)
For a Construction Permit)
for a New TV Station on)
Channel 45 at Miami, Florida)

MM DOCKET NO. 93-75

File No. BRCT-911001LY

File No. BPCT-911227KE

COPY

DEPOSITION OF PHILLIP A. CROUCH

Santa Ana, California

Thursday, September 30, 1993

Sarnoff
**DEPOSITION
SERVICE, INC.**

REPORTED BY:

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1 during the period of time when you were chief of staff,
2 would it not?

3 A Yes.

4 Q The corporate minutes reflect that you were
5 elected as an assistant secretary of Trinity Broadcasting
6 Network, Inc., that you were a vice president and assistant
7 secretary and director of Trinity Broadcasting of Arizona,
8 Inc., and that you were an assistant secretary of Trinity
9 Broadcasting of Florida, Inc.

10 Do you have any recollection of those events
11 having taken place?

12 A I only know that I remained on the board of the
13 station in Arizona because I had been there for four years
14 and they were able to call on me for assistance, help, in
15 any kind of situation that might develop there. I can't
16 remember anything that ever did.

17 But it was a matter of the fact that I was on
18 that board, so they just left me there, I guess. Activity
19 was only a matter of, I think, for signing checks, or
20 something like that, when the secretaries or other officers
21 were not available and something had to be done.

22 Q What you just described is what you understood
23 to be your duties as a corporate officer?

24 A Correct.

25 Q Now, as a board member of Trinity Broadcasting

1 of Arizona, Inc., do you have any recollection of there
2 being board meetings and actions taken by the board at times
3 other than at the annual meeting that is noted here?

4 A No, sir, there was no occasion like that.

5 Q Now I want to show you the third page of those
6 minutes. It reflects that you were elected as assistant
7 secretary of Trinity Broadcasting of Oklahoma City, Inc.,
8 assistant secretary of Trinity Broadcasting of Indiana,
9 Inc., assistant secretary of Translator Television, Inc.,
10 assistant secretary of Trinity Broadcasting of Denver, Inc.,
11 and, likewise, with Trinity Broadcasting of New York, Inc.
12 and Trinity Broadcasting of Washington.

13 Do you have any recollection of these events
14 taking place?

15 A No, sir, I do not.

16 Q Do you have any knowledge as to why you would
17 have been elected as assistant secretary of Translator
18 Television, Inc.?

19 A No, sir.

20 Q Do you have any knowledge as to who elected
21 you?

22 A No, sir, I don't.

23 Q Do you have any recollection of being called
24 upon to perform any duties on behalf of Translator
25 Television, Inc.?

Shaw
DEPOSITION
SERVICE, INC.

1 A Nothing except to occasionally sign a check.

2 Q Do you recall there becoming a time when you
3 were made an authorized signatory on a bank account for
4 National Minority Television?

5 A I do not recall a time when that actually took
6 place. I guess I'd have to say no, sir.

7 Q Let me show you some information that we
8 received from your counsel. And by "your counsel," I don't
9 mean you personally. I mean the corporate counsel.

10 A Yes.

11 Q Now, we'll try to get this stated in the record
12 so we all know what I'm showing the witness. The page
13 number I have here is 5, and I don't have which section of
14 the TBN/NMTV response it was, but at the top it is noted as
15 part 2.1, "A copy of TTV's/NMTV's minutes is attached as
16 Attachment 2." Then it moves on to number 3, which was a
17 question posed by the Commission or a request for
18 information to the effect or where it asks for "List all
19 bank accounts maintained by NMTV and KNMT(TV) since 1980.
20 For each such account state," and then there is (a) through
21 (d) in terms of information requested.

22 Now, it also asks, "For each such bank account,
23 provide copies of all signature cards." The response given
24 for 3.1 reads, "The following accounts have been maintained
25 by NMTV," and the first account noted is the Bank of

1 notes reflect, and correct me if I'm wrong, that you
2 testified that you were not, underscore "not," aware that
3 you were an officer of National Minority Television; is that
4 correct?

5 A I thought that I was an officer of Trinity
6 Broadcasting as an assistant secretary, and that is all.

7 Q When did you learn for the very first time,
8 this morning while you've been in this deposition, that you
9 were an officer at one time of National Minority Television?

10 A Mr. Topel filled me in on that when I met with
11 him Monday evening.

12 Q You say he filled you in. How did he fill you
13 in?

14 A Showing me some of these documents that I
15 signed.

16 Q Was that the first time that you were aware,
17 when Mr. Topel filled you in, that you were an officer of
18 National Minority Television?

19 A That is correct.

20 Q Do you have a recollection of ever receiving
21 any copies of minutes prepared by National Minority
22 Television?

23 A No, sir.

24 Q And it's your testimony you have never
25 discussed with your brother, Paul Crouch, anything

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COHEN & BERFIELD

In re Applications of)
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Channel 45 at Miami, Florida)
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MM DOCKET NO. 93-75

File No. BRCT-911001LY

File No. BPCT-911227KE

COPY

DEPOSITION OF CHARLENE E. WILLIAMS

Santa Ana, California

Tuesday, September 29, 1993

Sarnoff
**DEPOSITION
SERVICE, INC.**

REPORTED BY:

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JOB NO. 136939

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Fax 619.544.9901

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1 Santa Ana, California, Tuesday, September 29, 1993

2 1:25 p.m.

3

4 CHARLENE E. WILLIAMS,

5 produced as a witness by and on behalf of Glendale

6 Broadcasting Company, and having been first duly sworn, was

7 examined and testified as follows:

8

9 EXAMINATION

10 BY MR. SHOOK:

11 Q Would you state your full name for the record.

12 A Charlene E. Williams.

13 Q Your home address?

14 A 11823 Court Circle, Fountain Valley, 92708.

15 Q That's in California?

16 A Yes.

17 Q Your work address?

18 A I do not work.

19 Q How long is it that you have not been working?

20 A About eight days, seven days.

21 Q Who was your employer prior to the time you

22 stopped working?

23 A Trinity Broadcasting Network.

24 Q How long did you work for Trinity?

25 A Almost six years, five and a half years.

1 A The -- to be able to sign checks.

2 Q At that point, you were informed that you were
3 an officer of the corporation?

4 A Yes, sir.

5 Q Were you made an officer of any corporation
6 other than National Minority Television?

7 A Yes, sir.

8 Q Which corporations were you made an officer of?

9 A Trinity Broadcasting Networks and it's
10 affiliates.

11 Q Can you tell me approximately when this took
12 place?

13 A Trinity Broadcasting Network took place in the
14 later part of July in 1988. National Minority, I probably
15 didn't learn about that until August -- late August.

16 Q Of 1988?

17 A Right.

18 Q You mentioned the signing of checks. Was that
19 the reason that was given to you, that you were made an
20 officer National Minority and Trinity?

21 A Convenience. Yes.

22 Q Was any other reason given to you?

23 A No.

24 Q Did you become aware that any other reason
25 existed?

Samuel
DEPOSITION
SERVICE, INC.

1 A No.

2 Q Do you know who did?

3 A No.

4 Q Did there come a time when you became an
5 officer of National Minority Television, Inc.?

6 A Yes.

7 Q Can you tell me how that came about?

8 A Not specifically.

9 Q Well, give me your best recollection of how
10 that occurred.

11 A How I found out about it or how it occurred?

12 Q Well, first how it occurred, then we can ask
13 you about how you found out about it.

14 A I don't actually know how it occurred, all I
15 know is how I found out about it.

16 Q Well, for example, you didn't ask anybody to
17 become an officer, did you?

18 A No, sir.

19 Q Can you tell me how you found out you became an
20 officer?

21 A They asked me to sign the signature cards.

22 Q And who was "they"?

23 A Jane Duff and Paul Crouch.

24 Q By "the signature cards," what is it that
25 you're referring to?

1 A What was the question, one more time?

2 Q Does that list accurately describe the services

3 that TBN was providing for NMTV while you were employed at

4 Trinity?

5 A I can't say whether they all were or not.

6 Q Do you know of any services that Trinity

7 provided that aren't listed there? Could you spend a

8 minute --

9 A No, sir, I don't.

10 Q No?

11 A No, I don't.

12 Q You may have answered this question for

13 Mr. Shook and, if so, I apologize. What was the reason that

14 you ceased being an officer of NMTV?

15 A What was the reason?

16 Q What was the reason? Were you given any reason

17 were you why no longer --

18 A No, sir, there was no reason.

19 Q You never inquired?

20 A No.

21 Q How did you learn you weren't an officer

22 anymore?

23 A I don't know.

24 Q You don't know?

25 A No, I just assumed it, and that's wrong.

CERTIFICATE OF SERVICE

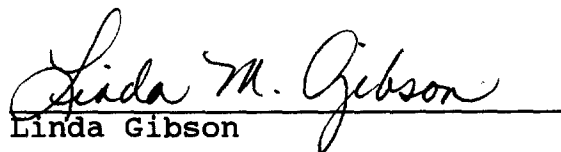
I, Linda Gibson, do hereby certify that on the 19th day of November 1993, a copy of the foregoing "Response to Objections to Witness Notification" was sent via first-class mail, postage prepaid to the following:

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Discrimination


Linda Gibson

* Hand Delivered